

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FIRST GUARANTY MORTGAGE)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , ¹)	
)	(Joint Administration Requested)
)	
Debtors.)	Hearing Date: July 1, 2022 at 10:00 a.m. (EST)
)	Related Docket Nos. 20 and 22

NOTICE OF HEARING ON POSTPETITION FINANCING MOTIONS

PLEASE TAKE NOTICE that on June 30, 2022, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief* [Docket No. 22] (the “Cash Flow DIP Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”)

PLEASE TAKE FURTHER NOTICE that on June 30, 2022, the Debtors also filed the *Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

with Respect to the Relief Requested Herein; and (VI) Granting Related Relief [Docket No. 20] (the “DIP Repo Motion”, together with the Cash Flow DIP Motion, the “DIP Motions”) with the Court.

PLEASE TAKE FURTHER NOTICE that the Debtors attached to the Cash Flow DIP Motion the proposed *Interim Order (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief* (the “Proposed Interim Cash Flow DIP Order”). A copy of the Proposed Interim Cash Flow DIP Order is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that the Debtors attached to the DIP Repo Motion the proposed *Interim Order Pursuant to 11 U.S.C §§ 105, 361, 362, 363, 364, 503, 507, 546, 548, 555, 556, 559, 560 and 561 (I) Authorizing the Debtors to Enter Into Repurchase Agreement Facilities and Related Documents; (II) Authorizing Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief* (the “Proposed DIP Repo Interim Order”, together with the Proposed Interim Cash Flow DIP Order, the “Proposed Interim DIP Orders”). A copy of the Proposed DIP Repo Interim Order is attached hereto as Exhibit B.

PLEASE TAKE FURTHER NOTICE that the Debtors intend to seek interim approval of the DIP Motions and entry of the Proposed Interim Orders in substantially the form attached hereto at a hearing (the “Interim Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801, on July 1, 2022, at 10:00

a.m. (Eastern time). Copies of the DIP Motions may be obtained for free at www.kccllc.net/FGMC or for a fee through the Court's website at www.deb.uscourts.gov, referencing Case No. 22-10584 (CTG).

PLEASE TAKE FURTHER NOTICE that after the Interim Hearing, the Debtors will serve upon you a complete copy of (a) the DIP Motions, (b) any Interim Orders entered by the Court at the Interim Hearing, and (c) notice of the final hearing on the DIP Motions.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to modify, if necessary, the Proposed Interim Orders before or at the Interim Hearing.

Dated: June 30, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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Proposed Counsel for Debtors and Debtors in Possession